

# EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**IN RE: TERRORIST ATTACKS ON           :**  
**SEPTEMBER 11, 2001                   :**     **MDL 03-1570 (GBD)(SN)**

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**This Document Relates To:   All Cases**

**~~PROPOSED~~ ORDER**

Counsel for the *Havlish* Plaintiffs, having reached a private settlement agreement with the law firms of Motley Rice LLC; Kreindler & Kreindler LLP; Speiser Krause, PC; and Anderson Kill PC, on behalf of their firms and clients, the *Havlish* Plaintiffs’ Renewed Motion for an Order Creating a Common Benefit Fund and Authorizing Certain Disbursements Therefrom (MDL Dkt. No. 4289 & 4291) (“the Motion”), is hereby dismissed with prejudice as against Motley Rice LLC, Kreindler & Kreindler LLP; Speiser Krause, PC; and Anderson Kill PC and their clients.

Counsel for any other party with claims against the Islamic Republic of Iran


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impacted by the Motion may contact counsel for the *Havlish* Plaintiffs if interested in attempting to reach a private settlement of the Motion.

DEC 12 2023

DATE: \_\_\_\_\_  
New York, New York

SO ORDERED.

  
\_\_\_\_\_  
GEORGE B. DANIELS  
UNITED STATES DISTRICT JUDGE